

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**MASSACHUSETTS ELECTRIC
COMPANY ET. ALS.**

D.T.E. 04-119

**PETITION FOR LIMITED PARTICIPANT STATUS OF
KEYSPAN ENERGY DELIVERY NEW ENGLAND**

Pursuant to 220 C.M.R. 1.03, KeySpan Energy Delivery New England (“KeySpan”)¹ hereby petitions the Department of Telecommunications and Energy (“Department”) for leave to participate as a limited participant in the above-captioned proceeding. In support of this request, KeySpan states the following:

1. The KeySpan companies are Massachusetts corporations located at 52 Second Avenue, Waltham, MA 02451.
2. The KeySpan companies are gas companies as defined in G.L. c. 164, § 1, and are regulated by the Department, pursuant to G.L. c. 164.
3. On January 13, 2005, the Department opened an investigation into the petition of Massachusetts Electric Company, Nantucket Electric Company, New England Hydro Transmission Electric Company, Inc. and New England Power Company (together “National Grid”) for approval to modify the National Grid USA Money Pool.
4. On March 16, 2001, in docket D.T.E. 00-100 the Department approved the petition of Boston Gas Company, Colonial Gas Company and Essex Gas

¹ The three Massachusetts local distribution companies that do business as KeySpan Energy Delivery New England are Boston Gas Company, Colonial Gas Company and Essex Gas Company.

Company each d/b/a KeySpan Energy Delivery New England to participate in a Utility Money Pool Agreement.

5. The Department's investigation in this proceeding is likely to raise issues dealing with Utility Money Pool Agreements that are common to other gas companies in Massachusetts, including KeySpan.
6. KeySpan's limited participant status will not jeopardize the Department's investigation in any way.
7. KeySpan's interests are unique and cannot be adequately represented by any other party.
8. Accordingly, KeySpan seeks to take part as a limited participant in this case, and where appropriate, to file comments, attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Hearing Officer.

Wherefore, KeySpan respectfully requests that the Department grant this Petition for Limited Participant Status.

Respectfully submitted,

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Dated: January 28, 2005